

**THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JOVAN STREETER,)	
)	
Plaintiff,)	
)	
v.)	Case No. 24-cv-4158
)	
CITY OF CHICAGO et al.,)	Hon. Mary M. Rowland
)	
Defendants.)	

**DEFENDANT RODRIQUEZ’S UNOPPOSED MOTION
FOR LEAVE TO WITHDRAW AND SUBSTITUTE ATTORNEYS AND
FOR LIMITED EXTENSION OF TIME TO COMPLETE FACT DISCOVERY**

Defendant, Chicago Police Officer Richard Rodriquez (#12157), respectfully moves this Honorable Court to allow the withdrawal of Gregory M Beck, Jahnee Hughes, and Kevin Thomas Meehan, Corporation Counsel for the City of Chicago, as his attorneys, and to substitute Brian P. Gainer, Lisa M. McElroy, and Jack A. Gainer, of the law firm of JOHNSON & BELL, LTD., as his attorneys. In addition, Defendant Rodriquez respectfully requests that this Honorable Court grant an extension of time, up to and including January 19, 2026, for the limited purpose of completing Defendant Rodriquez’s deposition. In support of this motion, Defendant Rodriquez states as follows:

1. On October 28, 2025, this Honorable Court extended fact discovery to December 15, 2025, to allow for the completion of depositions. [Dkt. 66].
2. On November 13, 2025, this Honorable Court ordered Defendant Rodriquez to sit for his deposition prior to the close of discovery on December 15, 2025. [Dkt. 69].
3. On December 2, 2025, Kevin Meehan, Assistant Corporation Counsel for the City of Chicago, filed his motion for leave to withdraw from his representation of Defendant Rodriquez.
4. On or before December 4, 2025, Brian P. Gainer, Lisa M. McElroy and Jack A. Gainer, of Johnson & Bell Ltd., filed their appearances on behalf of Defendant Rodriquez.

5. Counsel from Johnson & Bell, Ltd., was recently assigned this matter and needs additional time to confer with Defendant Rodriguez, learn more about the incident which forms the basis of the Complaint in this case, and become familiar with the other facts, circumstances, and proceedings in this matter. Additional time is also necessary to permit counsel from Johnson & Bell, Ltd. and Defendant Rodriguez to prepare for his forthcoming deposition.

6. This request is not made for the purpose of delay or any other improper purpose. Rather, this request seeks to extend fact discovery only for the limited purpose of permitting newly appointed counsel a reasonable opportunity to familiarize themselves with this case and prepare for Defendant Rodriguez's forthcoming deposition.

7. Plaintiffs will not be prejudiced if Defendant's motion is granted. Defendant Rodriguez will be significantly prejudiced if this motion is denied. Undersigned counsel has conferred with Plaintiffs' counsel about this request. Plaintiffs' counsel has indicated that he does not oppose this motion in principle but requests an in-person status hearing to discuss this motion.

WHEREFORE, Defendant Rodriguez respectfully requests that this Honorable Court grant leave for the withdrawal and substitution of attorneys, as set forth above, and to extend fact discovery, up to and including January 19, 2025, for the limited purpose of completing Defendant Rodriguez's deposition.

Dated: December 4, 2025

Respectfully submitted,

/s/ *Brian P. Gainer*
Attorney for Defendant Rodriguez

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SUBSTITUTION OF ATTORNEYS

Gregory M Beck, Jahnee Hughes, and Kevin Thomas Meehan, Corporation Counsel for the City of Chicago, hereby withdraw as counsel on behalf of Defendant, Ofc. Richard Rodriquez Jr., in the above-captioned cause, and consents to a substitution.

BY: /s/ Jahnee Hughes
Jahnee Hughes, Assistant Corporation Counsel
for the City of Chicago

JOHNSON & BELL, LTD., hereby enters their substitution of counsel on behalf of Defendant, Ofc. Richard Rodriquez Jr., in the above-captioned cause, in lieu of Gregory M Beck, Jahnee Hughes, and Kevin Thomas Meehan, Corporation Counsel for the City of Chicago, whose appearance is hereby withdrawn.

BY: /s/ Brian P. Gainer
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